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September 16, 2024

**VIA CM/ECF**

The Honorable Sherry R. Fallon  
The United States District Court  
for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, Delaware 19801

**Re: *Benjamin Bin Chow v. Canyon Bridge Capital Partners, et al.*,  
C.A. No. 22-00947-JLH-SRF**

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Dear Judge Fallon,

I write on behalf of defendants Canyon Bridge Capital Partners, LLC, Canyon Bridge Fund I, LP, Hong John Kao, Heber Raymond Bingham, and Peter Chin Kuo (collectively “Defendants”) in response to Plaintiff Benjamin Bin Chow’s (“Plaintiff”) September 13, 2024 letter concerning a proposed scheduling order (D.I. 59, the “Letter”) to clarify the record. In the Letter, Plaintiff states that Defendants “did not submit any counter-proposals.” This is incorrect, as evidenced by the email chain attached as Exhibit 2 to the Letter. First, Defendants proposed, consistent with Defendants’ motion to continue the deadline (D.I. 53, the “Motion”), that the parties extend the deadline to submit a schedule until after the Court ruled on the Motion. Second, Defendants made clear that they could not agree “to the proposed trial dates because Defendants’ Delaware counsel has a conflict with another trial at that time.” D.I. 59, at Ex. 2. Accordingly, it is not the case that Defendants refused to confer on the scheduling proposal and Defendants respectfully request that the Court strike Plaintiff’s proposal and order the parties to submit a proposal after ruling on the Motion.

Counsel are available should Your Honor have any questions.

Respectfully,

/s/ *Jesse L. Noa*

Jesse L. Noa (#5973)

cc: Daniel Taylor, Esq. (via CM/ECF)  
Jason Z. Miller, Esq. (via CM/ECF)